

EXHIBIT H

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

JASON WILLIAMS,

Plaintiff,

vs.

AT&T MOBILITY LLC,

Defendant.

Case No. 5:19-cv-00475-BO

**AT&T MOBILITY LLC'S FIRST
SUPPLEMENTAL INITIAL
DISCLOSURES PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 26(a)(1)**

Defendant AT&T Mobility LLC (“AT&T”), by and through undersigned counsel, hereby makes the following first supplemental initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

These disclosures are made prior to the completion of discovery, after making a good faith inquiry and investigation as is reasonable under the circumstances. This investigation is continuing, and AT&T reserves the right to correct and/or supplement these disclosures pursuant to Rule 26(e) should it become aware of additional relevant information.

By making the following disclosures, AT&T does not represent that it is identifying every document, tangible thing, or witness relevant to this lawsuit. In addition, AT&T does not waive its right to object to any discovery request or proceeding involving or relating to these disclosures on any grounds, including competency, privilege, the work product doctrine, relevancy, hearsay, materiality,

undue burden, or any other valid objection. Furthermore, these disclosures are not an admission by AT&T regarding any matter. All of the disclosures set forth below are made subject to the above qualifications.

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Subject to the above qualifications, and in addition to the information AT&T disclosed in its May 18, 2020 initial disclosures, AT&T identifies the following additional individuals who may have knowledge regarding the claims or defenses in this matter:

<u>Name & Contact Information</u>	<u>Employer</u>	<u>Area of Knowledge</u>
Brian Rexroad, VP Security Platforms	AT&T	Knowledge regarding industry issues, evolution of customer authentication, use of SMS as a second factor, account takeover tactics and security responses
Valerie Scheder, AVP Global Fraud Management	AT&T	Knowledge regarding measures AT&T takes in an effort to prevent SIM swap fraud and to remediate customers
Kristi Parrott, AVP Global Fraud Management	AT&T	Knowledge regarding measures AT&T takes in an effort to prevent SIM swap fraud and to remediate customers
Ray Hill, Director Project Program Management	AT&T	Knowledge regarding AT&T's policies and procedures for customer authentication and account access in retail stores and consumer care call centers.

AT&T also anticipates the potential need for testimony and/or evidence from additional persons identified through discovery.

By this initial disclosure statement, AT&T does not authorize Plaintiff or its representatives to communicate with AT&T's present or former employees, outside contractors, agents, representatives or other individuals who may have privileged information, or authorize any communications otherwise prohibited by applicable rules of professional conduct. Any such individuals should be contacted through AT&T's counsel.

This 21st day of October, 2020.



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CERTIFICATE OF SERVICE

I hereby certify that on date set out below, I served the foregoing document by electronic mail sent to the following:

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This the 21st day of October, 2020.



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